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Attorneys for Defendant
 UBER TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

TAJE GILL, ESTERPHANIE ST. JUSTE,
 and BENJAMIN VALDEZ, individually and
 on behalf of all others similarly situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC., a Delaware
 corporation, and LYFT, INC., a Delaware
 corporation,

Defendants.

Case No. 4:22-cv-04379-JSW

**STIPULATION TO ADJOURN TIME
 FOR DEFENDANTS TO ANSWER /
 OTHERWISE RESPOND AND
~~[PROPOSED]~~ ORDER REGARDING
 MOTION TO REMAND BRIEFING
 SCHEDULE**

Judge: Hon. Jeffrey S. White
 Courtroom: 5 – 2nd Floor

1 **IT IS HEREBY STIPULATED** by and between Plaintiff Taje Gill, Plaintiff Esterphanie
 2 St. Juste, and Plaintiff Benjamin Valdez (collectively, “Plaintiffs”), Defendant Uber Technologies,
 3 Inc. (“Uber”), and Defendant Lyft, Inc. (“Lyft”) (Plaintiffs and Defendants are collectively referred
 4 to herein as the “Parties”), by and through their respective counsel, that:

5 WHEREAS, Uber removed this action to this Court from the Superior Court of the State of
 6 California, San Francisco County on July 28, 2022;

7 WHEREAS, Civil Local Rule 6-1(a) provides that “Parties may stipulate in writing, without
 8 a Court order, to extend the time within which to answer or otherwise respond to the complaint, or
 9 to enlarge or shorten the time in matters not required to be filed or lodged with the Court, provided
 10 the change will not alter the date of any event or any deadline already fixed by Court order”;

11 WHEREAS, Plaintiffs anticipate filing a motion to remand pursuant 28 U.S.C. § 1447 on
 12 or by August 29, 2022;

13 WHEREAS, the Parties stipulate to adjourn Uber’s and Lyft’s time to answer or otherwise
 14 respond to the Complaint (whether in federal court or state court) until 45 days after the Court rules
 15 on the motion to remand;

16 WHEREAS, Civil Local Rule 6-1(b) provides that “A Court order is required for any
 17 enlargement or shortening of time that alters an event or deadline already fixed by Court order or
 18 that involves papers required to be filed or lodged with the Court (other than an initial response to
 19 the complaint)” and “A request for a Court order enlarging or shortening time may be made by
 20 written stipulation pursuant to Civil L.R. 6-2 or motion pursuant to Civil L.R. 6-3”;

21 WHEREAS, there have been no previous requests for time modification in this case and
 22 there are only two scheduled dates currently in place for the case: (1) the Joint Case Management
 23 Statement is due by October 28, 2022, and (2) the Initial Case Management Conference is set for
 24 November 4, 2022, and this requested modification will not affect the existing schedule for the
 25 case;

26 WHEREAS, the Parties have agreed there is good cause to extend the briefing schedule
 27 with respect to Plaintiffs’ forthcoming motion to remand, such that any opposition will be due on
 28 September 28, 2022, and any reply will be due on October 12, 2022, given the schedule of counsel

and the issues to be addressed in the briefing;

WHEREAS, the Parties will confer and jointly propose a possible hearing date for Plaintiffs' forthcoming motion to remand; and

ACCORDINGLY, pursuant to Civil Local Rules 6-1(a) and 7-12, the Parties, by and through their respective counsel, hereby stipulate and agree to adjourn Uber's and Lyft's time to answer or otherwise respond to the Complaint (whether in federal court or state court) until 45 days after the Court rules on Plaintiffs' forthcoming motion to remand; and

Pursuant to Civil Local Rules 6-2, 7-3, and 7-12, the Parties, by and through their respective counsel, hereby stipulate and agree that any opposition to Plaintiffs' forthcoming motion to remand shall be filed by September 28, 2022, and any reply shall be filed by October 12, 2022.¹

Dated: August 4, 2022

TOWARDS JUSTICE

By: /s/ Rachel W. Dempsey

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Attorneys for Plaintiffs and the Putative Class

¹ Defendants do not, by agreeing to this stipulation, waive their objections to personal jurisdiction, insufficient process, insufficient service of process, or proceeding outside arbitration. Plaintiffs agree that they will not assert in federal or state court that there has been any waiver of any defense based on an assertion of lack of personal jurisdiction, insufficient process, insufficient service of process, or proceeding outside arbitration, because of the Parties' agreement to the terms and scheduling proposal set out in this Stipulation.

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2
3 Dated: August 4, 2022

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5 By: /s/ Justin P. Raphael

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15 Dated: August 4, 2022

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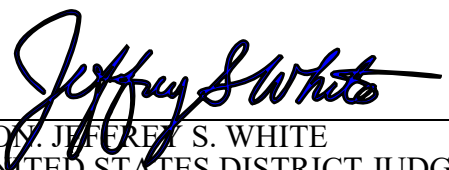
Attorneys for Defendant
UBER TECHNOLOGIES, INC.

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED: Uber's and Lyft's time to answer or otherwise respond to the Complaint is ADJOURNED until 45 days after the Court rules on Plaintiffs' forthcoming motion to remand. Further, IT IS HEREBY ORDERED that (1) Plaintiffs' motion for remand shall be filed by August 29, 2022; (2) Uber's opposition to the remand motion shall be filed by September 28, 2022; and (3) Plaintiffs' reply shall be filed by October 12, 2022.

IT IS SO ORDERED.

DATED: August 5, 2022

By: 

HON. JEFFERY S. WHITE
UNITED STATES DISTRICT JUDGE

Submitted by:

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

By: /s/ Joshua Hill
Attorney for Uber Technologies, Inc.